

1 **HONE LAW**

2 Jill Garcia, NV Bar No. 7805

3 jgarcia@hone.law

4 Eric D. Hone, NV Bar No. 8499

5 ehone@hone.law

6 Amy L. Howard, NV Bar No. 13946

7 ahoward@hone.law

8 701 N. Green Valley Parkway, Suite 200

9 Henderson, NV 89074

10 Phone 702-608-3720

11 Fax 702-608-7814

12 *Attorneys for Defendants*

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

15 DONAVAN McINTOSH,

16 Case No. 2:21-cv-01505-APG-EJY

17 Plaintiff,

18 vs.

19 CITY OF NORTH LAS VEGAS, a Municipal
20 Corporation and political subdivision of the
21 State of Nevada; PAMELA OJEDA in her
22 official and/or individual capacities; CLINTON
23 RYAN in his official and/or individual
capacities; ALEJANDRO RODRIGUEZ in his
official and/or individual capacities; DOES I-X,

17 **STIPULATION AND ORDER TO
EXTEND DEADLINE FOR JOINT PRE-
TRIAL ORDER**

18 **[FIRST REQUEST]**

19 Defendants.

20 Defendants City of North Las Vegas (“CNLV”), Pamela Ojeda (“Chief Ojeda”), Clinton
21 Ryan (“Asst. Chief Ryan”), and Alejandro Rodriguez (“Lt. Rodriguez,” and collectively,
22 “Defendants”) and Plaintiff Donavan McIntosh (“Plaintiff”), by and through their undersigned
23 counsel, hereby file this Stipulation and Order to Extend Deadline for Joint Pre-Trial Order (First
Request).

- 24 1. The current scheduling order granted on July 20, 2023, provides that the Joint Pretrial
25 Order is due 60 days after the Court's ruling on any dispositive motions. [ECF No.
26 27.]
- 27 2. On July 28, 2023, The Court issued an order on the Motion for Summary Judgment
28 [ECF No. 40] which ordered that Plaintiff has until August 25, 2023, to file his



1 Second Amended Complaint. [ECF No. 59] Plaintiff filed his Second Amended
2 Complaint. [ECF No. 60]. The parties met and conferred on the inclusion of claims
3 and allegations in the Second Amended Complaint but did not reach an agreement.
4 3. Under FRCP 15(a)(3), CNLV had 14 days to respond to the Amended Complaint.
5 CNLV filed a Motion to Strike on September 8, 2023. [ECF No. 61].
6 4. The parties have met and conferred related to the Joint Pretrial Order but need
7 additional time to finalize the Joint Pretrial Order, in light of the Summary Judgment
8 Order. The parties stipulate and agree to a 45-day extension of the current Joint
9 Pretrial Order deadline. The Joint Pretrial order will be due November 10, 2023.
10 5. Plaintiff's counsel has been on a long-planned and pre-paid transatlantic cruise
11 vacation from September 12-September 28, 2023, and has, thus, been unable to work
12 on the Joint Pretrial Order during this time frame.
13 6. The requested extension is sought in good faith and not for purposes of undue delay.
14 IT IS STIPULATED AND AGREED that the parties shall file the Joint Pre-Trial Order
15 no later than November 10, 2023.

16 Dated this 25th day of September 2023.

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18 /s/ Amy Howard
19 Jill Garcia, NV Bar No. 7805
jgarcia@hone.law
20 Eric D. Hone, NV Bar No. 8499
ehone@hone.law
21 Amy L. Howard, NV Bar No. 13946
ahoward@hone.law
701 N. Green Valley Parkway, Suite 200
22 Henderson, NV 89074

23 *Attorneys for Defendants*

Dated this 25th day of September 2023.

KEMP & KEMP, ATTORNEYS AT LAW

24 /s/James Kemp
25 James P. Kemp, NV Bar No. 6375
jp@kemp-attorneys.com
26 7435 W. Azure Drive, Suite 110
Las Vegas, NV 89130

27 *Attorneys for Plaintiff*

28 **IT IS SO ORDERED.**

29 
30 UNITED STATES MAGISTRATE JUDGE

31 Dated: September 25, 2023

